

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
SECURITIES INVESTOR PROTECTION :
CORPORATION, :

Plaintiff-Applicant, :

v. :

BERNARD L. MADOFF INVESTMENT :
SECURITIES, LLC, :

Defendant. :

-----X
In re: :

BERNARD L. MADOFF, :

Debtor. :

-----X
IRVING H. PICARD, Trustee for the Liquidation :
Of Bernard L. Madoff Investment Securities LLC :

Plaintiff, :

v. :

STANLEY SHAPIRO, individually, as general :
partner of S&R Investment Co., as trustee for LAD :
Trust, as trustee for David Shapiro 1989 Trust, as :
amended, and as trustee for Leslie Shapiro 1985 :
Trust, as amended, :

RENEE SHAPIRO, individually, as general partner :
of S&R Investment Co., as trustee for LAD Trust, :
as trustee for David Shapiro 1989 Trust, as :
amended, and as trustee for Leslie Shapiro 1985 :
Trust, as amended, :

S&R INVESTMENT CO., :

LAD TRUST, :

DAVID SHAPIRO, individually and as trustee for :
Trust f/b/o [W.P.S.] & [J.G.S.], :

SIPA LIQUIDATION

No. 08-01789 (BRL)

Adv. Pro. No. 10-05383(SMB)

RACHEL SHAPIRO,

DAVID SHAPIRO 1989 TRUST, as amended,

TRUST F/B/O [W.P.S] & [J.G.S.],

LESLIE SHAPIRO CITRON,

LESLIE SHAPIRO 1985 TRUST, as amended,

TRUST F/B/O [A.J.C.], [K.F.C.], & [L.C.C.]

KENNETH CITRON, individually and as trustee
For Trust f/b/o [A.J.C.], [K.F.C.], & [L.C.C.]

Defendants.

-X

NOTICE OF MOTION TO QUASH

PLEASE TAKE NOTICE that, pursuant to Federal Rule of Civil Procedure 45, Stanley Shapiro and the Estate of Renee Shapiro, by their undersigned counsel, will move before the Honorable Jed S. Rakoff, United States District Court Judge, at the United States District Court for the Southern District of New York, 50 Pearl Street, New York, New York 10007, as soon as counsel may be heard, for an Order quashing the subpoena served by the Trustee upon non-party JPMorgan Chase Bank, N.A. dated September 11, 2018 and for such other and further relief as the Court deems just, equitable, and proper.

PLEASE TAKE FURTHER NOTICE that in support of this motion, Stanley Shapiro and the Estate of Renee Shapiro shall rely on the accompanying Memorandum of Law and the Declaration of Barry R. Lax, Esq., dated October 15, 2018, and its accompanying exhibits.

PLEASE TAKE FURTHER NOTICE that Stanley Shapiro and the Estate of Renee Shapiro request oral argument if this Motion is opposed.

Dated: New York, New York
October 15, 2018

LAX & NEVILLE LLP

By: /s/ Barry R. Lax

Barry R. Lax
Robert R. Miller
Mary Grace White
1450 Broadway, 35th Floor
New York, NY 10018
Telephone: (212) 696 - 1999
Facsimile: (212) 566 - 4531

*Attorneys for Stanley Shapiro and the Estate of
Renee Shapiro*